

1 **P O R T E R | S C O T T**

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11 Attorneys for Defendants CITY OF ROSEVILLE, OFFICER DEAN RIANO, OFFICER SETH ADDINGTON, and
12 SERGEANT CHRISTOPHER CIAMPA

13 *Exempt from filing fee pursuant to Government Code section 6103*

14 **UNITED STATES DISTRICT COURT
15 EASTERN DISTRICT OF CALIFORNIA**

16 KATHERINE ROBLES, an individual; and H.R.,
17 by and through his guardian ad litem Katherine
18 Robles;

19 Plaintiffs,

20 vs.

21 CITY OF ROSEVILLE, a Municipal
22 Corporation; OFFICER DEAN RIANO, in his
23 official and personal capacity; OFFICER SETH
24 ADDINGTON, in his official and personal
25 capacity; SERGEANT CHRISTOPHER
26 CLAMPA, in his official and personal capacity;
27 and DOES 1-20, inclusive, individually, jointly
28 and severally,

29 Defendants. _____ /

30 **Case No.: 2:22-cv-00085-KJM-DB**

31 **STIPULATION TO CONTINUE DEADLINES IN
32 SCHEDULING ORDER AND PROPOSED
33 ORDER**

34 Complaint filed: 01/14/2022

35 The parties hereto, by and through their undersigned counsel of record, hereby enter the following
36 stipulation which they respectfully request that the Court enter as an Order in this action:

37 WHEREAS, on January 14, 2022, Plaintiff Katherine Robles, and minor H.R., by and through his
38 guardian ad litem Katherine Robles (collectively "Plaintiffs"), filed a Complaint against the Defendants City

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1 of Roseville, Dean Riano, in his official and personal capacity; Seth Addington, in his official and personal
2 capacity; Christopher Ciampa, in his official and personal capacity, (collectively “Defendants”) in the
3 United States District Court for the Eastern District of California, the Sacramento Division.

4 WHEREAS, on June 3, 2022, the Honorable Kimberly J. Mueller ‘s Minutes for the Scheduling
5 Conference held on June 2, 2022 (ECF No. 18), established the initial dates. Whereas, pursuant to the
6 stipulation of the parties and this Court’s order, the deadlines were continued to the following dates (ECF
7 No. 26):

- 8 1. Fact Discovery Completion: November 30, 2023;
- 9 2. Expert Disclosures: February 12, 2024;
- 10 3. Rebuttal Expert Witnesses shall be exchanged by March 13, 2024;
- 11 4. All expert discovery shall be completed by April 2, 2024; and
- 12 5. All dispositive motions, except for motions for continuances, temporary restraining orders
13 or other emergency applications, shall be heard by July 19, 2024.

14 WHEREAS, on May 30, 2023, the parties completed mediation with a private mediator. The case
15 did not resolve at the mediation.

16 WHEREAS, on June 23, 2023, the Court granted Plaintiffs’ request to substitute in new counsel of
17 record.

18 WHEREAS, Plaintiffs’ new counsel of record and Defendants’ counsel have met and conferred
19 extensively regarding issues related to discovery and a potential second private mediation session.

20 WHEREAS, given the foregoing, the parties need additional time to evaluate Plaintiffs’ claimed
21 injuries and damages, evaluate if a second mediation session would be a productive use of the parties’ time
22 and resources, attend a potential second mediation, and, if the second mediation is unsuccessful or if the
23 parties determine a second mediation would not be productive, conduct further discovery to prepare the case
24 for a dispositive motion and or trial.

25 THEREFORE, the Parties hereby stipulate there is good cause for and jointly request that the Court
26 grant an extension for the above listed deadlines as follows:

- 27 1. Fact Discovery Completion: June 28, 2024;

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- 1 2. Expert Disclosures: July 26, 2024;
- 2 3. Rebuttal Expert Witnesses shall be exchanged by August 26, 2024;
- 3 4. All expert discovery shall be completed by October 25, 2024; and
- 4 5. All dispositive motions, except for motions for continuances, temporary restraining orders
- 5 or other emergency applications, shall be heard by January 31, 2025.

6 **IT IS SO STIPULATED.**

7
8
9 Dated: October 9, 2023

PORTER SCOTT
A PROFESSIONAL CORPORATION

11 By: /s/ William E. Camy
12 William E. Camy
13 Megan N. Boelter
14 Attorney for Defendants

15 Dated: October 9, 2023

16 THE LAW OFFICES OF DALE K. GALIPO

18 By: /s/ Dale K. Galipo
19 Benjamin S. Levine
20 Dale K. Galipo
21 Attorneys for Plaintiffs

ORDER

Having reviewed the foregoing stipulation, and good cause appearing, the Court hereby amends its prior scheduling orders to reflect the below revised dates:

1. Fact Discovery Completion: June 28, 2024;
 2. Expert Disclosures: July 26, 2024;
 3. Rebuttal Expert Witnesses shall be exchanged by August 26, 2024;
 4. All expert discovery shall be completed by October 25, 2024; and
 5. All dispositive motions, except for motions for continuances, temporary restraining orders or other emergency applications, shall be heard by January 31, 2025.

IT IS SO ORDERED.

Dated: October 12, 2023.

CHIEF UNITED STATES DISTRICT JUDGE